

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE CHESTER COUNTY HOSPITAL	:	CIVIL ACTION
	:	NO. 02-2746
v.	:	
	:	
INDEPENDENCE BLUE CROSS,	:	
QCC INSURANCE COMPANY,	:	
KEYSTONE HEALTH PLAN EAST, and	:	
KEYSTONE MERCY HEALTH PLAN	:	

**MOTION FOR ADMISSION
PRO HAC VICE OF KEVIN C. MACLAY**

Non-Parties CIGNA Healthcare of Pennsylvania, CIGNA MidAtlantic Healthcare and Connecticut General Life Insurance Company (collectively, “CIGNA”), by their attorneys, JONES DAY, respectfully move this Court to allow Kevin C. Maclay, Esquire, of JONES DAY, to appear in this Court for the purpose of protecting CIGNA’s interest in the confidentiality of its information.

As set forth in the attached declaration, Mr. Maclay is a member in good standing of the bars of the State of Maryland and the District of Columbia. It is the desire of CIGNA that Mr. Maclay serve as counsel for CIGNA relating to the present action. Should the Court grant this Motion, the undersigned, a member in good standing of the Bar of the Commonwealth of Pennsylvania admitted to practice before the United States District Court for the Eastern District of Pennsylvania, shall remain associated with Mr. Maclay.

WHEREFORE, Non-Party CIGNA respectfully requests that the Court grant the Motion and allow the appearance of Mr. Maclay.

Christopher T. Koegel (PA Bar # 86413)
JONES DAY
51 Louisiana Avenue, NW
Washington, DC 20001
Tel.: (202) 879-3939
Fax: (202) 626-1700

Attorneys for Third-Party CIGNA

Dated: July 2, 2003

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE CHESTER COUNTY HOSPITAL	:	CIVIL ACTION
	:	NO. 02-2746
v.	:	
	:	
INDEPENDENCE BLUE CROSS,	:	
QCC INSURANCE COMPANY,	:	
KEYSTONE HEALTH PLAN EAST, and	:	
KEYSTONE MERCY HEALTH PLAN	:	

**DECLARATION OF KEVIN C. MACLAY IN SUPPORT
OF MOTION FOR APPEARANCE *PRO HAC VICE***

I, Kevin C. Maclay, declare and state as follows:

1. I graduated from the University of Virginia School of Law in 1994. I am a member in good standing of the bars of the State of Maryland and the District of Columbia.
2. I hereby certify that there are no grievances pending against me, and that I have never been reprimanded, suspended, disbarred or have resigned from the practice of law.

I declare under penalty of perjury that the foregoing is true and correct.

Kevin C. Maclay

Dated: July 2, 2003.

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2003, a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* was served via first class mail on the following counsel:

Paul S. Diamond, Esquire
William J. Leonard, Esquire
Obermayer Rebmann Maxwell & Hippel, LLP
One Penn Center, 19th Floor
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1895

John DeQ. Briggs, III, Esquire
Howrey Simon Arnold & White LLP
1299 Pennsylvania Avenue, NW
Washington, DC 20004

Richard A. Feinstein
Daniel A. Kotchen
Kevin R. Anthony
Boies, Schiller & Flexner LLP
5301 Wisconsin Avenue, NW
Washington, DC 20015

Lewis R. Olshin
Wayne A. Mack
J. Manly Parks
Keith J. Verrier
Duane Morris, LLP
One Liberty Place
Philadelphia, Pennsylvania 19103-7396

Christopher T. Koegel

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE CHESTER COUNTY HOSPITAL	:	CIVIL ACTION
	:	NO. 02-2746
v.	:	
	:	
INDEPENDENCE BLUE CROSS,	:	
QCC INSURANCE COMPANY,	:	
KEYSTONE HEALTH PLAN EAST, and	:	
KEYSTONE MERCY HEALTH PLAN	:	

ORDER

The Motion of Non-Parties CIGNA Healthcare of Pennsylvania, CIGNA MidAtlantic Healthcare and Connecticut General Life Insurance Company (collectively, “CIGNA”) for the *pro hac vice* admission of Kevin C. Maclay having come before the Court, and the Court having determined that the application satisfies the requirements of all applicable rules, it is therefore:

ORDERED that Kevin C. Maclay is authorized to appear as counsel for CIGNA before the United States District Court for the Eastern District of Pennsylvania in matters that relate to Non-Party CIGNA.

SO ENTERED this day of , 2003.

BY THE COURT:
